

Fact Sheet Chemical Munitions Storage
Management Work Plan Blue Grass Army Depot
(BGAD) 431 Battlefield Memorial Highway,
Richmond, Madison County, Kentucky EPA I.D.
KY8213820105, AI2805

May 25, 2009

The Kentucky Energy and Environment Cabinet (Cabinet) and the Division of Waste Management (Division) have tentatively approved a Chemical Munitions Storage Management Work Plan submitted by the Blue Grass Army Depot (BGAD). The Division considers the work plan to be protective of human health and the environment and compliant with the Commonwealth of Kentucky hazardous wastes statutes and regulations.

Purpose of the Work Plan Approval Process

The purpose of the work plan approval process is to afford interested citizens and other governmental agencies the opportunity to evaluate the ability of the applicant (Blue Grass Army Depot) to comply with applicable hazardous waste management regulations promulgated under the Kentucky Revised Statutes. The Cabinet is required by KRS 224.50-130 (5)(a) to public notice all work plans involving nerve and blister agents. This work plan is a renewal of a work plan approved by the Cabinet on July 1, 2008. The only exception is that the three one-ton containers have been removed since they no longer exist on the depot due to Operation Swift Solution. The public is given thirty (30) days to review the work plan and comment on it prior to the Cabinet taking any final action.

The comment period will begin on **May 24, 2009**, concurrent with publication of the public notice in the *Lexington Herald-Leader*. Another ad will be run in both the *Richmond Register* (Sunday, **May 24**) and the *Berea Citizen* (**Thursday, May 28**). The public comment period will end on **June 25, 2009**.

After consideration of all written comments and requirements of state laws and regulations, the Manager of the Hazardous Waste Branch within the Division of Waste Management will make a final decision regarding approval of the work plan.

Brief Description of the Work Plan

The Chemical Munitions Storage Work Plan summarizes the planned implementation of management practices involving handling and movement within igloos of chemical munitions containing nerve agents GB (Sarin) and VX, and blister agent H (mustard). All operations will occur inside igloos at the Blue Grass Chemical Activity (BGCA) Chemical Limited Area located at the Blue Grass Army Depot (BGAD).

This work plan outlines re-palletizing and re-warehousing munitions. Re-palletizing means removing munitions from a pallet and placing them on a new pallet. Re-warehousing means relocating, adjusting, and/or restacking of pallets within an igloo.

Examples of typical maintenance tasks involving re-palletizing and re-warehousing includes, but are not limited to:

- Re-warehousing a leaning stack of palletized munitions, so that it is not touching the wall.
- Adjusting a stack of chemical munitions to ensure stability and appropriate spacing.

- Re-palletizing munitions from a damaged pallet to a new pallet.
- Moving pallets to address moisture problems in the igloos.

These maintenance tasks are periodically required in order to maintain compliance with the Department of Defense guidelines and to accomplish risk reduction initiatives. Routine maintenance of the chemical munitions involves performing visual inspections, air monitoring, and general housekeeping. Pallets that are misaligned, have shifted, or are damaged, are noted in the inspection record. However, routine inspections do not permit movement (re-warehousing and/or re-palletizing) of munitions. Exercise of this "no action" alternative does not adequately address the need to correct storage deficiencies that could lead to more significant failures requiring emergency action.

This work plan is a renewal of a similar Work Plan that was approved by the Division on July 1, 2008 and expires on June 30, 2009. BGCA has surveyed the inventory of hazardous waste and has decided to request renewal of the work plan to address additional re-palletizing and re-warehousing activities.

A powered carbon filter for the igloo vent will be test started prior to a planned operation, and made readily available for immediate deployment in the event of an emergency. See Section 3.3 of the work plan for a further discussion of air monitoring and filter operation. Continuous real-time air monitoring will be performed during each operation. If chemical agent is detected at 25% of the short term exposure limit at anytime during the activity, all operations will cease, field personnel will evacuate the igloo, the door will be closed, and the carbon filter will be deployed immediately.

All suspected agent contaminated equipment will be decontaminated in accordance with standard operating procedures. Dunnage materials suspected of being contaminated will be decontaminated and containerized for subsequent storage and disposal action. After completing the direct operations under this work plan, the igloo will be monitored clear for a minimum of two consecutive days to confirm effective agent containment and then returned to the routine weekly monitoring program.

This work plan will be effective for a period of one (1) year.

Where to Review the Work Plan and Where to Send Comments

The Chemical Munitions Storage Management Work Plan can be reviewed at the following locations:

Madison County Public Library, Richmond Branch
507 West Main Street
Richmond, KY 40475
Point of Contact: Sue Hays, Director
(859) 623-6704
Email: suehavs@madisonlibrary.org

Madison County Public Library, Berea Branch
319 E. Chestnut
Berea, KY 40403
Point of Contact: Abbie Harris
(859) 986-7112
Email: abbieh@madisonlibrary.org

Blue Grass Chemical Stockpile Outreach Office
1000 Commercial Drive, Suite 2
Richmond, KY 40475
Point of contact: Stephanie Parrett
(859) 626-8944
Email: bgoutreach@bah.com
Business Hours: M-F 8 a.m. to 5 p.m.

Eastern Kentucky University Public Library
521 Lancaster Ave.
Richmond, KY 40475
Point of Contact: Linda Sizemore
(859) 622-2068
Email: linda.sizemore@eku.edu

Division of Waste Management
200 Fair Oaks Lane
Frankfort, Kentucky 40601-1190
Point of contact: Tina Fisher
(502) 564-6716
Email: tina.fischer@ky.gov

Anyone wishing to submit a comment, needing additional information, or wanting to be put on the facility mailing list should contact:

April Webb
Kentucky Energy and Environment Cabinet Division of
Waste Management
200 Fair Oaks Lane
Frankfort, Kentucky 40601
Or: Email shannonl.powers@ky.gov

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